

# Exhibit A

# LEWIS & LIN LLC

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February 3, 2025

**VIA U.S. AND ELECTRONIC MAIL**

YouTube, Inc.,  
Attn Legal Support  
901 Cherry Ave, Second Floor  
San Bruno, CA 94066  
By Email: [legal@support.youtube.com](mailto:legal@support.youtube.com)

***RE: Paul Saladino, M.D. v. Frank Tufano and Frankie Free-Range Meat, LLC***  
***Case No.: 20-cv-09346***  
***Court-Mandated Removal of YouTube Videos***

Dear Legal Support:

My firm represents Plaintiff Paul Saladino, M.D. in the above-captioned matter, *Paul Saladino, M.D. v. Frank Tufano and Frankie Free-Range Meat, LLC*, Case No.: 20-cv-09346 in the Southern District of New York.

Please take note that on January 30, 2025, the United States District Court for the Southern District of New York entered an Order of Default, enclosed here, mandating the removal of several YouTube videos, listed below:

- The First Nov. 7, 2019 Video: <https://www.youtube.com/watch?v=cyXgRJ99gks>;
- The video published February 5, 2020:  
[https://www.youtube.com/watch?v=TJI8H1\\_joO8](https://www.youtube.com/watch?v=TJI8H1_joO8);
- The video published October 16, 2020:  
<https://www.youtube.com/watch?v=u4phKzDtfkE>;
- The video published October 18, 2020:  
<https://www.youtube.com/watch?v=2qTeIKWcCg8>;
- The video published October 31, 2020:  
<https://www.youtube.com/watch?v=ycGK23AC4J4>;
- The Nov. 19, 2020 Video: <https://www.youtube.com/watch?v=s4eEVzzaylM>.

## LEWIS & LIN LLC

Accordingly, we are requesting the removal of all of the above-linked videos in accordance with Court order. Please confirm receipt of this correspondence and let us know the timeline of YouTube removing these videos.

Sincerely,

A handwritten signature in cursive script that reads "Rachel Ann Niedzwiedek".

Rachel Ann Niedzwiedek

Enclosures: January 30, 2025 Default Order (ECF No. 59)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

PAUL SALADINO, MD.,

**ORDER OF DEFAULT**

- against -

20 cv 09346 (NSR)

FRANK TUFANO and  
FRANKIE FREE-RANGE MEAT, LLC,

Defendants.

-----X

Nelson S. Román, D.J.:

WHEREAS, this action was commenced on November 7, 2020, by the filing of the Summons and Complaint, and a copy of the Summons and Complaint was personally served on the Defendant Frank Tufano, on November 20, 2020, by personal service, and a proof of service was filed on November 25, 2020;

WHEREAS on March 9, 2021, Plaintiff served the Co-Defendant Frankie's Free-Range Meat, LLC, with the Summons and First Amended Complaint, by effectuating service upon the New York Secretary of State and proof of service was filed on March 16, 2021;

WHEREAS despite having received service of process, the Defendants Frank Tufano and Frankie's Free-Range Meat, LLC have not answered the First Amended Complaint, and the time for the Defendants to answer the First Amended Complaint has lapsed;

WHEREAS in the Amended Complaint, Plaintiff has asserted five separate causes of action sounding in violations of the Lanham Act, pursuant to 15 U.S.C. § 1125(a) and 15 USC § 1125(d),

New York State Gen. Bus. Law 148, New York State Gen. Bus. Law §349, and common law Defamation;

WHEREAS it is an “ancient common law axiom” that a defendant who defaults thereby admits all “well-pleaded” factual allegations contained in the complaint. *City of New York v. Mickalis Pawn Shop, LLC*, 645 F.3d 114, 137 (2d Cir. 2011) quoting *Vt. Teddy Bear Co. v. 1-800 Beargram, Co.*, 373 F.3d 241, 246 (2d Cir. 2004);

WHEREAS Defendants Frank Tufano and Frankie’s Free-Range Meat, LLC have defaulted in this action;

WHEREAS Plaintiff seeks to recover damages on all of his claims, including under the Lanham Act, consisting of compensatory, punitive and statutory damages (in the amount of \$100,000.00), pre-judgment and post-judgment interest, reasonable attorney’s fees and cost;

WHEREAS Plaintiff seeks a Court Order enjoining Defendants Frank Tufano and Frankie Free-Range Meat. LLC, and those acting in concert, from publishing any further defamatory statements concerning the Plaintiff;

WHEREAS Plaintiff seeks a Court Order Directing the Defendants Frank Tufano and Frankie Free-Range Meat. LLC, to forthwith delete and remove any and all defamatory videos from Defendant Frank Tufano’s YouTube Channel;

WHEREAS Plaintiff seeks a Court Order Directing the Defendants Frank Tufano and Frankie Free-Range Meat. LLC, to immediately take down, remove, delete the defamatory website <PaulSaladino.com>;

WHEREAS Plaintiff seeks a Court Order Directing the Defendants Frank Tufano and Frankie Free-Range Meat. LLC, to immediately transfer ownership of the domain name <PaulSaladino.com> to Plaintiff; it is hereby

ORDERED, ADJUDGED AND DECREED: That Plaintiff is hereby entitled to and is granted a Judgment of Default as to each and every claim as against each named Defendant Frank Tufano and Frankie's Free-Range Meat, LLC, on the issue of liability;

ORDERED, ADJUDGED AND DECREED: That Defendants shall forthwith or within a reasonable time permanently transfer the Domain Name <PAULSALADINO.COM> to Plaintiff;

ORDERED ADJUDGED AND DECREED: That Defendants are enjoined from making public statements referencing that Plaintiff copied, plagiarized, stole or otherwise improperly used Defendants' or any other third party's work; engages in dishonest practices in connection with his business, trade, or profession; abuses prescription or illegal drugs; improperly or illegally manipulates social media posts; or engages in any inappropriate sexual activity;

ORDERED ADJUDGED AND DECREED: That Defendants are directed to forthwith remove and delete all of the defamatory videos on Defendant's YouTube channel related to Plaintiff, including:

- a. The First Nov. 7, 2019 Video: <https://www.youtube.com/watch?v=cyXgRJ99gks>;
- b. The video published February 5, 2020: [https://www.youtube.com/watch?v=TJI8H1\\_joO8](https://www.youtube.com/watch?v=TJI8H1_joO8);
- c. The video published October 16, 2020: <https://www.youtube.com/watch?v=u4phKzDtfkE>;
- d. The video published October 18, 2020: <https://www.youtube.com/watch?v=2qTeIKWcCg8>;
- e. The video published October 31, 2020: <https://www.youtube.com/watch?v=ycGK23AC4J4>;
- f. The Nov. 19, 2020 Video: <https://www.youtube.com/watch?v=s4eEVzzaylM>; and
- e. any other video containing defamatory statements related to Plaintiff; and

ORDERED, ADJUDGED AND DECREED: The parties are directed to contact the Chambers of the Honorable Judge Judith C. McCarthy for the purpose of scheduling a hearing and issuing a Report and Recommendation on an assessment of damages, including compensatory and statutory damages, reasonable attorney's fees and cost.

Dated: White Plains, New York  
January 30, 2025

SO ORDERED:

A handwritten signature in dark ink, appearing to read "N. Roman", is written over a light blue horizontal line.

Hon. Nelson S. Roman  
U.S. District Court Judge, S.D.N.Y.